UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: AFTERMARKET FILTERS ANTITRUST LITIGATION

Master Docket No. 08-cv-4883 MDL Docket No. 1957

This Document Relates To: Direct Purchaser Actions Judge Robert W. Gettleman Magistrate Geraldine Soat Brown

DIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION TO CONSOLIDATE ESCROW ACCOUNTS

The Direct Purchaser Plaintiffs ("Plaintiffs") respectfully move this Court to enter an Order consolidating the six escrow accounts for the settlements with Defendants Champion Laboratories, Inc., Honeywell International, Wix Filtration Corp. LLC, Affinia Group Inc., Cummins Filtration Inc., Donaldson Company, Inc. and Baldwin Filters, Inc. (collectively, "Settled Defendants") at the Huntington Bank. Settled Defendants do not oppose this Motion. The consolidation of the six escrow accounts will allow for greater efficiency in managing the settlement funds.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order consolidating the six escrow accounts for the Settled Defendants.

Dated: October 1, 2012

/s/ Michael J. Freed

Michael J. Freed Steven A. Kanner FREED KANNER LONDON & MILLEN, LLC 2201 Waukegan Rd. – Suite 130

Bannockburn, IL 60015 Telephone: (224) 632-4500

Fax: (224) 632-4521

Respectfully submitted,

/s/ Roberta D. Liebenberg

Roberta D. Liebenberg

Adam J. Pessin

FINE KAPLAN & BLACK, R.P.C. 1835

Market Street –28th Floor Philadelphia, PA 19103 Telephone: (215) 567-6565

Fax: (215) 568-5872

/s/ Bernard Persky

Bernard Persky Gregory Asciolla LABATON SUCHAROW LLP

140 Broadway New York, NY 10005

Telephone: (212) 907-0700

Fax: (212) 818-0477

Co-Lead Counsel for Direct Purchaser Plaintiffs